6.0 OVERVIEW OF THE PUBLIC PARTICIPATION PROCESS

This chapter summarizes the public comments received on this EIS. The sub-chapters address the following:

- Public Scoping for this EIS
- Workshops for State and Local Officials along Potential Transportation Routes
- Public Comments on the Draft EIS
  - Public Hearings
  - Written Comments

Public comments are addressed in detail in Chapter 9 of the Final EIS. Chapter 9 also includes a reproduction of all of the written comments, a summary of oral comments from public comment hearings, and DOE's responses to all of the comments.

6.1 Public Scoping for This EIS

On November 19, 1996, DOE published in the *Federal Register* a Notice of Intent to prepare this EIS ("Notice of Intent to Prepare an Environmental Impact Statement on Management of Certain Plutonium Residues and Scrub Alloy Stored at the Rocky Flats Environmental Technology Site," 61 *Federal Register* 58866). This notice identified the preliminary scope of the EIS and invited public comments on the preliminary alternatives identified for preparing certain Rocky Flats plutonium residues and scrub alloy for disposal or other disposition.

The alternatives in the Notice of Intent were identified as follows:

Alternative 1 – No Action (same as in this Final EIS),
Alternative 2 – Onsite Treatment (with and without plutonium separation) and
Alternative 3 – Offsite Treatment (with and without plutonium separation).

DOE conducted the public scoping process from November 19, 1996, to December 19, 1996, but continued to accept all comments received beyond the closing date. During the scoping period, two public scoping meetings were held – one at Rocky Flats on December 3, 1996, and one near the Savannah River Site (in North Augusta, South Carolina) on December 12, 1996. Comments were received from individuals at these scoping meetings. In addition, DOE received written comments from 30 organizations and individuals. Copies of all written comments and summaries of comments made at the public scoping meetings are kept on file at DOE Headquarters in Washington, D.C., and in public reading rooms identified on the map in Figure S-30 and in Chapter 7 of this Summary.

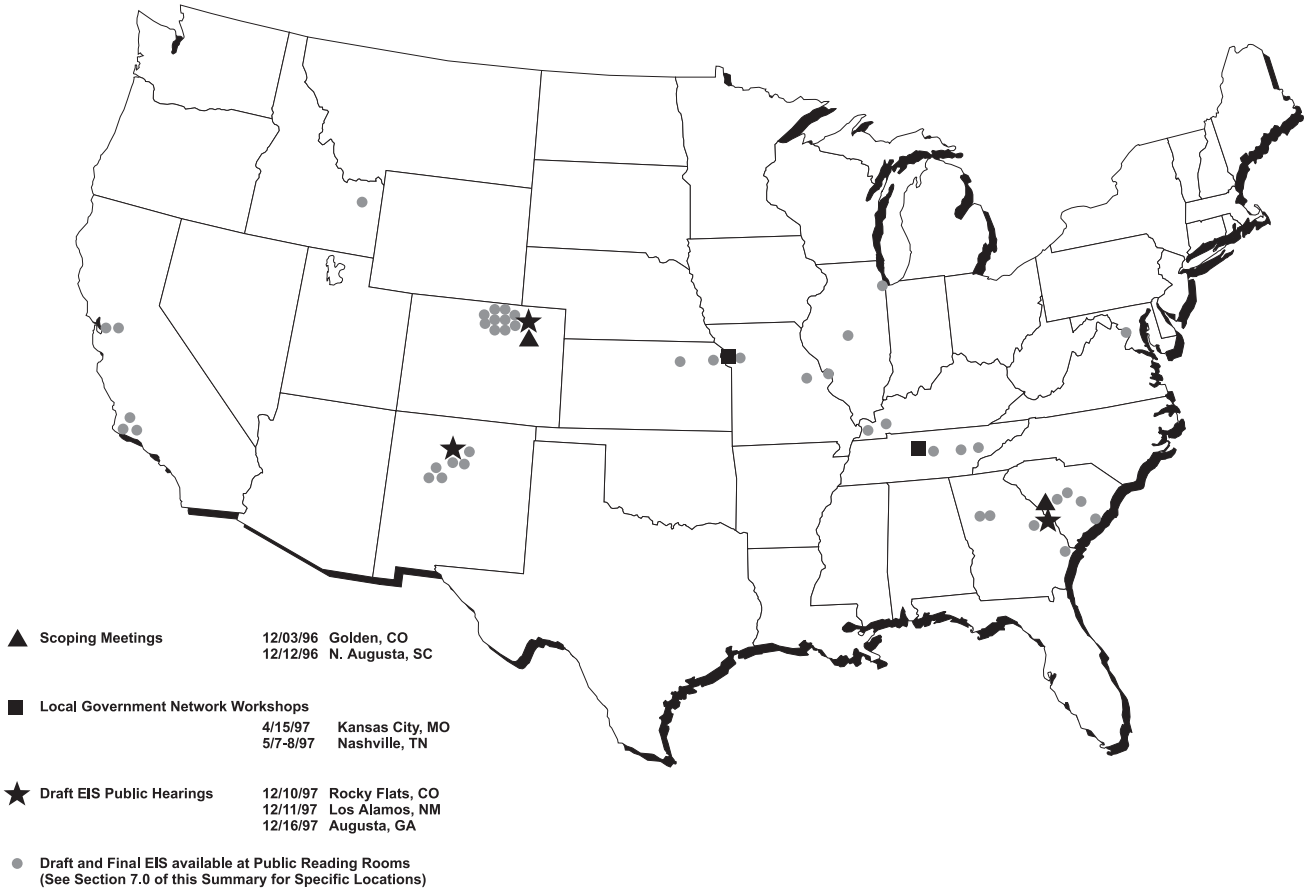
Almost half of the public scoping comments were from individuals and organizations in the Rocky Flats area (including a coalition of organizations with a specific interest in Rocky Flats activities), and most of the remainder were from individuals and organizations in the Savannah River Site area (including the Savannah River Site's Citizens Advisory Board). A few were from national organizations.

Most of the scoping comments included positions for or against the management alternatives presented in the Notice of Intent. No scoping comments were received on processing at Los Alamos National Laboratory or Lawrence Livermore National Laboratory, which were sites also considered in Alternative 3 (the latter site has since been dropped from consideration as an alternative). In providing these comments on the alternatives, specific comments were provided on related issues dealing with the following:

- Storage of the stabilized or processed materials
- Ultimate disposition of the stabilized or processed materials (e.g., WIPP disposal, mixed oxide fuel)
- Proliferation
- Transportation
- Environment, safety, and health risks
- Costs

A more detailed summary of the public scoping comments is presented in Section 1.3 of the Draft EIS, which is discussed in Section 6.3 below.

Figure S-30. Location of Hearings, Workshops, and Public Reading Rooms



6.2 Workshops for State and Local Officials Along Potential Transportation Routes

Prior to publication of the Draft EIS, DOE held workshops with the Local Government Network (composed of emergency response personnel and State and local officials along DOE transportation corridors). The workshops took place as follows:

- Kansas City, MO, April 16-17, 1997
- Nashville, TN, May 7-8, 1997

About 80 individuals participated in these workshops, during which DOE provided an overview of the upcoming Draft EIS, identified the potential shipments that could take place if a decision were reached to process the materials offsite, discussed the nature of the materials that could be shipped and the transport system that would be used for the shipments (e.g., the Safe Secure Trailer and the Type B shipping containers), and obtained feedback from the workshop attendees on their issues of concern. In addition to the question/answer sessions, the workshops included smaller break-out sessions that allowed participants to focus more in-depth on particular areas of interest. Meeting summaries from these two workshops are available in the DOE Reading Rooms identified in Chapter 7 of this Summary. Key suggestions and comments from those workshops include the following:

- Improve methods for making local citizens and officials more aware of the upcoming shipments (i.e., improve the distribution of information, such as widening the distribution list, using local PBS affiliates or radio stations to advertise and moderate public meetings, making the EIS available on a web page, distributing an information package, etc.).

- Provide more information on the shipment casks and Safe Secure Trailer (SST) system, including ongoing research, past history of shipments, amounts and nature of material inside the casks, truck and trailer sizes, and radiological monitoring.
- Share SST procedures with local government officials and emergency response personnel.
- Involve state and local government officials in developing the transportation plans for these shipments, including working out details ahead of time on issues such as safe parking and bad weather protocols; provide advance notifications.
- Improve coordination and funding for training of states and local officials in emergency response and provide the necessary equipment; enhance use of mutual aid agreements.

Following these workshops, DOE prepared a fact sheet on the potential plutonium residue shipments, which included information on the shipping casks and the SST, and distributed several copies of the fact sheet to the attendees at this meeting. The attendees volunteered at the workshops to distribute the fact sheets within their communities (e.g., media outlets and libraries). An updated version of this fact sheet is included in Appendix A of the Final EIS. In addition, DOE provided updates on this EIS at subsequent Local Government Network meetings.

6.3 Issuance of the Draft EIS

In developing the Draft EIS, DOE considered the various scoping comments and presented analyses that addressed many of the concerns or questions. DOE also identified the criteria used to screen the various alternatives considered since scoping. The presentation of the alternatives in the Draft EIS was modified from the Notice of Intent as follows: Alternative 2 was modified to include only processing without plutonium separation, which would be conducted at Rocky Flats. Alternative 3 was modified to include Rocky Flats as a candidate site for processing with plutonium separation and to eliminate Lawrence Livermore National Laboratory as a candidate processing site. Alternative 3 was also modified to only consider processing with plutonium separation. Preferred processing technologies were identified for most of the material categories and subcategories in the Draft EIS.

The Environmental Protection Agency announced the availability of the Draft EIS in the *Federal Register* on November 21, 1997 (62 FR 62303). In addition, DOE mailed copies of the full Draft EIS and/or the Summary to over 1,000 individuals and organizations who were on DOE's mailing list (from previous requests) or who specifically requested copies during or after the comment period. The public had access to a toll-free number (1-800-736-3282) directed to the DOE Office of Environmental Management's Center for Environmental Management Information in order to request copies of the Summary or full EIS.

The public comment period was held from November 25, 1997, to January 5, 1998. However, DOE continued to accept and consider comments received after the closing date.

6.4 Summary of Public Comments on the Draft EIS

This section summarizes the key comments DOE received on the Draft EIS, both in writing and orally (at public meetings). Key changes made to this EIS since publication of the Draft EIS, in response to public comments and further evaluations, are summarized in Chapter 1 of this Summary and of the EIS. The comments and DOE responses are presented in Chapter 9 of the Final EIS.

6.4.1 Summary of Written Comments on the Draft EIS

Written submissions were received from 39 individuals and organizations. Of those

- 15 were from representatives of environmental, citizen, or business organizations.
- 10 were from State agencies.

- 5 were from Federal agencies.
- 7 were from individuals.
- 2 were from Cities.

The localities represented by the written submissions were as follows:

- 13 were from individuals or organizations in the Savannah River Site area; however, 7 of them were acknowledgments of receipt/no comment from South Carolina state agencies.
- 11 were from the Rocky Flats area.
- 8 were from the Los Alamos area.
- 4 were from those along transportation corridors.
- 3 were national in representation.

Most commentors provided their positions on the alternatives or processes (many of which addressed plutonium separation processes), provided specific comments on the analyses presented in the EIS, and identified concerns regarding associated issues such as storage; ultimate disposition; proliferation risks; transportation; environmental, safety and health risks; and costs.

Of the 39 written submissions (received by U.S. mail and email), close to 200 specific comments were delineated. Chapter 9 of the Final EIS presents each of the written submissions, the delineation of comments, and DOE's response to each comment. Key comments are summarized below (with DOE responses summarized) and are organized according to the following key issue areas:

- Alternatives or Processes
- Storage
- Ultimate Disposition
- Proliferation Risks
- Transportation
- Environmental, Safety and Health Risks
- Costs
- Other (miscellaneous).

Comments on Alternatives and Processes

Most of those who provided comments indicated their support for or opposition to a particular alternative or process, along with their reasons. Reasons dealt with issues such as proliferation risk, worker exposures, transportation, storage, ultimate disposition, increase in waste volume, and cost (these are further summarized in the sections following).

Alternative 1 - No Action -- Stabilize and Store (Rocky Flats)

Very few commentors stated a preference for the No Action Alternative, which would stabilize the plutonium residues and scrub alloy for interim storage at Rocky Flats. Those who did suggested that the materials be stabilized and stored at Rocky Flats until safer treatment and disposal methods can be developed. While not stated explicitly, most of the commentors did not support this alternative. Instead, they advocated one of the other alternatives or variations to those alternatives (e.g., other processing technologies).

In response to these comments, DOE has expanded Sections 1.1, 1.2, and 1.3 of the Final EIS to better clarify that the alternatives evaluated under the Proposed Action would not only stabilize the plutonium residues and scrub alloy to address immediate health and safety concerns raised by the Defense Nuclear Facilities Safety Board, but would also convert them into forms that would allow for their disposal or other disposition, thus eliminating health and safety concerns associated with indefinite storage of these materials. The No Action Alternative would not eliminate the long-term health and safety concerns. Nevertheless, DOE is required by the regulations implementing the National Environmental Policy Act to include evaluation of a No Action Alternative in the EIS. DOE has also responded individually to each comment related to the No Action Alternative in Section 9.5 of the Final EIS.

Alternative 2 - Processing Without Plutonium Separation (Rocky Flats)

Commentors were split on their positions regarding the implementation of this alternative at Rocky Flats. Comments supporting processing at Rocky Flats included the following reasons and suggestions:

- Alternative 2 is preferred because of opposition to plutonium separation and transportation of such materials.
- Rocky Flats has the capabilities to do all of the required stabilization and processing.
- DOE should minimize the number of processes, or use "one-step" processes.
- DOE should use only those technologies that are mature and have been demonstrated.

Comments against processing at Rocky Flats included the following reasons and suggestions:

- DOE has committed to clean up and close Rocky Flats.
- Rocky Flats has old and unsafe facilities, which lack an "authorization basis" to process.
- Any process that would result in airborne releases at Rocky Flats is not acceptable.
- DOE has better facilities at the Savannah River Site.
- It is more cost-effective to use large-scale and proven facilities at the Savannah River Site.
- DOE should evaluate sites, other than those identified, that have vitrification capabilities.

In response to these comments, DOE notes that Section 2.9 of the Final EIS provides DOE's rationale for selecting processing technologies (for each material category) for evaluation in this EIS and for the Preferred Alternative. The Preferred Alternative is described in Section 2.5 of the Final EIS. The only processing technology at Rocky Flats identified under Alternative 2 for the Preferred Alternative is blend-down of certain filter media residues (Ful-Flo filters).

In selecting processing technologies for evaluation under Alternative 2, DOE eliminated all sites from consideration except Rocky Flats. The costs and risks of preprocessing (which would be required prior to transport of the materials to another site for processing), transportation, and final processing would exceed that of final processing at Rocky Flats without providing any tangible benefits.

As described in Section 1.3.1 of the Final EIS, DOE has added Alternative 4, Combination of Processing Technologies, to specifically address those materials for which a variance from safeguards termination limits has been granted. The Preferred Alternative described in Section 2.5 of the Final EIS identifies those materials for which Alternative 4 is part of the Preferred Alternative.

DOE has also responded individually to each comment related to processing technologies without plutonium separation in Section 9.5 of the Final EIS.

Alternative 3 - Processing With Plutonium Separation (Rocky Flats, Savannah River Site, and Los Alamos National Laboratory).

About one-third of the commentors expressed strong opposition to shipment of the Rocky Flats residues and scrub alloy to either the Savannah River Site or Los Alamos National Laboratory for plutonium separation processes. Comments included the following reasons and suggestions:

- The proliferation risk would be greater if plutonium is separated during processing.
- Due to risks of accidents, these materials should not be transported.
- It is unnecessary to ship offsite — processing can be done at Rocky Flats.
- The separation process would result in a larger volume of waste than from nonseparation processes.
- DOE would be extending the life of the already aging canyons if processing with plutonium separation were to be chosen at Savannah River Site.
- DOE underestimated the costs of using the canyons.
- Separated plutonium should not be used as mixed oxide fuel in civilian nuclear powerplants.

Other commentors supported plutonium separation (some were directed specifically to plutonium separation at the Savannah River Site) because of the following reasons:

- The Savannah River Site has proven capabilities and is the only large-scale processing facility in the country.
- There is better security at the Savannah River Site and Los Alamos National Laboratory than at Rocky Flats.
- There is urgency to get the materials out of Rocky Flats so that the site can be closed.
- Processing at Savannah River Site would be more cost-effective.
- Plutonium has economic value (as an energy source).
- Separating plutonium and its disposition constitutes waste minimization.

Some commentors expressed concern about the feasibility of the salt distillation process at Los Alamos, stating that:

- The salt distillation process is not mature enough to be considered a preferred alternative.
- Los Alamos does not have capability to store the resulting americium-contaminated plutonium materials.

In response to these comments, DOE notes that Section 2.4 of the Final EIS provides DOE's rationale for selecting processing technologies (for each material category) for evaluation in this EIS and for the Preferred Alternative. The Preferred Alternative is described in Section 2.5 of the Final EIS. The only processing technologies under Alternative 3 identified for the Preferred Alternative are the Purex process at the Savannah River Site for certain ash residues (sand, slag and crucible), plutonium fluoride residues, and scrub alloy; and acid dissolution/plutonium oxide recovery at Los Alamos National Laboratory for certain (high assay) direct oxide reduction salts (these salts have two processing technologies under the Preferred Alternative — the other is repackaging at Rocky Flats).

A major consideration in evaluating the potential use of the Savannah River Site canyons for processing a limited quantity of plutonium residues and scrub alloy is that the materials would be handled remotely, resulting in low worker radiation exposures. The canyons have been maintained and upgraded during their life cycle to ensure continued operability. Furthermore, they are currently operating, demonstrating their ability to safely process nuclear materials. Processing the materials under the

Preferred Alternative, described in Section 2.5.2 of the Final EIS, would not require extending the operating life of the canyons as these facilities would be processing other previously-scheduled materials. As described in Section 2.5.2 of the Final EIS, salt distillation is no longer part of the preferred alternative. DOE has also responded individually to each comment related to processing technologies involving plutonium separation in Section 9.5 of the Final EIS.

Other Processing Options Not in Draft EIS.

Some commentors expressed their beliefs that none of the processing options identified in the Draft EIS were reasonable and offered suggestions for additional options. These included:

- DOE should vitrify to meet the "spent fuel standard" in small "cans-in-canisters" or a "large monolith" at Rocky Flats.
- Small, mobile units should be used to conduct immobilization activities — they could be used at multiple sites.

Other commentors suggested that the EIS be delayed in order to more thoroughly evaluate other alternatives or the EIS should provide more rationale on why these are not being considered. Specific suggestions include the following:

- DOE should delay this EIS until more evaluation is done on innovative technologies, such as the Glass Material Oxidation and Dissolution System being developed at Oak Ridge National Laboratory or the cold ceramification immobilization process being developed at the Idaho National Engineering and Environmental Laboratory. These innovative technologies could be demonstrated on a small scale at Rocky Flats.
- DOE should include more sites in the EIS evaluation.

In response to these comments, DOE notes that the technology and site screening process is described in Section 2.9.2 of this Final EIS. Issues raised during the public scoping process that are not analyzed in the EIS are described in Section 2.9.3 of the Final EIS. DOE has also responded individually to each comment related to other processing options not in the Draft EIS in Section 9.5 of the Final EIS.

Comments Related to Storage

A number of commentors addressed storage in their comments. Comments included the following:

- Continued storage at Rocky Flats is unacceptable (health and safety risks).
- DOE should evaluate contingency storage in the event of delays in opening the Waste Isolation Pilot Plant (WIPP).
- DOE did not adequately address impacts of long-term storage under the No Action alternative in the EIS.
- The materials should stay in storage (following stabilization or processing) at Rocky Flats "for the time being" and not be transported to another site.
- Stored plutonium resulting from plutonium separation poses proliferation risks.
- DOE should address the amount of americium-contaminated wastes that would result from the salt distillation process, as well as low-level waste, at Los Alamos National Laboratory and how these wastes would be stored or disposed.
- The public needs to be ensured that the processed materials at Los Alamos will not be stored indefinitely at that site.

- Separated plutonium from processes at the Savannah River Site canyons could be adequately accommodated in the new Actinide Packaging and Storage Facility.

In response to these comments, DOE has revised its evaluation of the No Action Alternative (Alternative 1) to explicitly analyze the impacts from continued storage of the stabilized residues and scrub alloy at Rocky Flats until a decision is made concerning their ultimate disposition. A storage period of 20 years was used for the purpose of analysis. A discussion of storage has been added to Section 2.3, 2.4, and 2.5.1 of this Final EIS, and the associated impacts have been added to Sections 4.2 through 4.11. For the other alternatives, a discussion of storage of processed material has been added to Section 4.14 of the Final EIS to address the possibility of WIPP not opening in the near future.

The analysis of storing any plutonium that would be separated during processing of salts at Los Alamos National Laboratory is contained in Sections 2.4.2.3 and 4.14 of the Final EIS. Under the Preferred Alternative, described in Section 2.5 of the Final EIS, the plutonium that would be separated during the processing of salts would not be contaminated with americium. The americium would go into the transuranic waste. DOE has also responded individually to each comment related to storage in Section 9.5 of the Final EIS.

Comments Related to Ultimate Disposition

A number of commentors expressed concern about DOE's reliance on WIPP to dispose of the processed or stabilized residues. Key comments included the following:

- DOE is relying too heavily on WIPP, which is unlikely to open on schedule or may never open (some commentors cited specific problems with WIPP as a safe disposal facility).
- WIPP's compliance certification application with the Environmental Protection Agency (EPA) (and EPA's certification authority) does not cover the amounts and concentrations of plutonium in the materials covered by this EIS that would be shipped to WIPP. DOE should clearly address the number of shipments, amounts of processed residues and scrub alloy, and plutonium/americium concentrations that would be going to WIPP under this EIS and whether variances would be required.

Some of the commentors who opposed plutonium separation also provided the following comment:

- Separated plutonium should not be used in making mixed oxide fuel for civilian nuclear power plants due to proliferation risks.

In response to these comments, DOE notes that, in January 1998, DOE issued a Record of Decision regarding alternatives evaluated in DOE's Waste Isolation Pilot Plant Disposal Phase Final Supplemental EIS (discussed in Section 1.5.4 of the Final EIS) to dispose of transuranic waste at WIPP. Nevertheless, the decision to open WIPP is outside the scope of this EIS. Section 4.14 of the Final EIS addresses the impacts from storing processed residues in the event that WIPP does not open on schedule.

In addition, in July 1998, DOE published a Draft EIS on Surplus Plutonium Disposition (discussed in Section 1.5.7 of the Final EIS). The disposition of any plutonium separated from Rocky Flats plutonium residues and scrub alloy would be determined in accordance with decisions to be reached under the Surplus Plutonium Disposition EIS. Any plutonium that would be separated under any alternative evaluated in this EIS would be immobilized. DOE has also responded individually to each comment related to ultimate disposition in Section 9.5 of the Final EIS.

Comments Related to Proliferation Risks

Perceived proliferation risks were the primary reasons commentors did not support Alternative 3 — Processing with Plutonium Separation. Comments included the following:

- DOE did not adequately address the issue of proliferation risk in the EIS.

- None of the alternatives were favorable to nonproliferation efforts and, thus, further evaluation should be conducted of innovative immobilization technologies (see "Other Processing Options Not in Draft EIS" above).

Several commentors expressed views concerning DOE's approach in seeking safeguards termination limit variances. These included:

- DOE's approach to seek a variance to safeguards termination limits is acceptable for those materials whose evaluations concluded that the materials presented minimal risk of proliferation.
- Variances to the safeguards termination limits presents an invitation to terrorists and, as such, the granting of variances is opposed.
- The EIS should include more discussion on the variances, including the rationale for variances and a clear path for materials that do or do not receive variances.
- State technical agencies should be involved in DOE's variance decisions.
- DOE should delay the EIS until variance decisions were made for all of the categories and subcategories.

In response to these comments, DOE agrees that nonproliferation goals should be an important factor in deciding the processing technology for each of the Rocky Flats plutonium residues and scrub alloy. Nuclear nonproliferation considerations, including long-term proliferation risks, are discussed in Section 4.1.9 of this EIS. None of the actions evaluated in this EIS, including those that involve plutonium separation, would result in a substantial increase in proliferation risk.

In addition, the discussion of variances to safeguards termination limits has been expanded in the Final EIS. The process to obtain a variance is described in detail in Section 1.2.1 of the Final EIS. Section 1.2 of the Final EIS discusses conditions under which a variance to safeguards termination limits may be applied. Section 1.3.1 of the Final EIS identifies materials that have received a variance and introduces Alternative 4, Combination of Processing Technologies, to address materials for which a variance from safeguards termination limits has been granted. DOE has also responded individually to each comment related to proliferation risks in Section 9,5 of the Final EIS.

Comments Related to Transportation

A number of commentors addressed transportation. Many of these commentors were strongly opposed to any transportation of plutonium-bearing materials and suggested that the materials remain at Rocky Flats. Primary reasons and suggestions were:

- Transportation of materials poses the potential for accidents and resulting exposures to the public and contamination.
- Rocky Flats has the ability to stabilize or process the materials and, as such, transporting the materials is unnecessary.
- DOE should not transport materials through major metropolitan areas, such as Atlanta and Augusta.

Other comments on transportation included the following:

- Transportation can be accomplished safely (citing DOE's safe transportation record).
- DOE should better communicate with the public on the safety of DOE's shipments.
- The public should have input to routing decisions.
- DOE should not transport materials in Type B shipping containers that have not been certified by the U.S. Nuclear Regulatory Commission.

In response to these comments, DOE notes that the amount of transportation that would occur is dependent on the processing technology that would be selected in the Record of Decision for each plutonium residue and scrub alloy. Under the Preferred Alternative described in Section 2.5.2 of the Final EIS, most of the materials considered in this EIS would be repackaged (with stabilization as necessary) at Rocky Flats, with minimal shipments to Los Alamos National Laboratory and the Savannah River Site for offsite processing (3 and 39 shipments, respectively). Section 2.8 of the Final EIS discusses the transportation system, including the Type B packaging used to transport these materials for any offsite processing. Appendix E, Section E.6, of this Final EIS shows that the incident-free radiological risk to the public in the form of latent cancer fatalities from transportation would be less than one fatality. The accident risk to the public, including latent cancer and traffic fatalities, would also be less than one. DOE has also responded individually to each comment related to transportation in Section 9.5 of the Final EIS.

Comments Related to Environmental, Safety, and Health Risks

About half of the comments addressed issues dealing with environment, safety, and health. These included comments on DOE's risk analysis methodology to determine impacts and concerns about risks posed by the alternatives.

Some commentors stated that the EIS analyses were adequate in addressing the impacts.

Others believed they were not adequate. Those comments dealing with inadequacies included the following:

- DOE underestimated worker exposures in the analyses (comments included both Rocky Flats and Savannah River Site processes). For example, DOE underestimated the condition of facilities at Rocky Flats (old and unsafe) and did not consider recent accidental exposures at the Savannah River Site.
- DOE should not compare voluntary activities (e.g., cigarette smoking) with involuntary activities.
- DOE underestimated waste volumes to be generated during processes.
- DOE underestimated water usage at Los Alamos National Laboratory.
- DOE needs to address RCRA permit modifications dealing with mixed waste in the EIS.
- WIPP documentation needs to address criticality due to some of the residue packages to be sent to WIPP.
- Transportation accidents pose unacceptable risks.

Some commentors (Federal and State agencies) noted no impacts from the proposed actions in this EIS, including no impacts to endangered or potentially endangered species and critical habitats. Some commentors offered comments on environmental justice or equity issues.

In response to these comments, DOE has made refinements to the impact analyses in Chapter 4 of the Final EIS. Some of the changes occurred because DOE re-evaluated many of the processing technologies and introduced some new processing technologies. DOE believes that the processing methods analyzed in this EIS would be safe, based on the small potential impacts (less than one latent cancer fatality), as described in Sections 4.21, 4.22, and 4.23 of this Final EIS. DOE has also responded individually to each comment related to environmental, health and safety risks in Section 9.5 of the Final EIS.

Comments Related to Costs

A few commentors included cost as a factor in their support or opposition of a technical alternative. These comments included the following:

- DOE should minimize costs devoted to duplicate processing facilities.
- The preferred alternative in the Draft EIS is not the least costly alternative.

- The plutonium separation processes will be more costly — DOE underestimated the costs of operating the canyons.
- Using Rocky Flats facilities for processing (no shipments offsite to more capable facilities) will be more costly.
- Rocky Flats should be prepared to cover costs of extending the life of the canyons if required to complete processing of Rocky Flats' materials.
- DOE must provide the necessary funding to implement the alternatives.
- Money devoted to plutonium separation should be redirected to pursuit of innovative immobilization technologies.

In response to these comments, DOE has provided a comparison of the costs of processing technologies in Section 4.17 of this Final EIS. Cost estimates range from $428 million for the Minimize Cost Approach to $1,129 million for the No Action Alternative. The Preferred Alternative has an estimated cost of $524 million. DOE has also responded individually to each comment related to costs in Section 9.5 of the Final EIS.

Other Comments — Miscellaneous

- DOE should define the ultimate decisionmaker for processing under this EIS.
- DOE should specify which site has ownership of the processed residues that will be shipped to WIPP.
- DOE has issued this EIS prematurely — more information on other innovative processing technologies, contingencies, and nonproliferation impacts is needed.
- DOE waited too long to address steps needed to remove the residues from Rocky Flats; expeditious DOE decisionmaking is vital to cleanup of Rocky Flats.
- More information is needed on selection criteria; the processing technologies in the preferred alternative are not consistent with selection criteria.
- The EIS was well-written and adequately addresses impacts.
- DOE should make the EIS available electronically.

DOE has responded individually to each miscellaneous comment in Section 9.5 of the Final EIS.

6.4.2 Environmental Protection Agency Rating of the Draft EIS

The U.S. Environmental Protection Agency, Region VIII, reviewed and rated the Draft EIS in its "Category EC-2," which indicates that "EPA has identified potential environmental impacts and the EIS does not contain sufficient information to fully assess these impacts." This rating was based on EPA's comment that there is no assurance that the Waste Isolation Pilot Plant will be open any time in the near future or if it will ever be open to accept waste. Thus, EPA is concerned that the alternatives analyzed in the Draft EIS did not specifically analyze interim storage of the processed residues pending disposal or other disposition, e.g., onsite storage. EPA commented that the EIS needs to have a back-up plan to safely secure and store all waste on site, including the evaluation of the use of existing buildings (upgrading) or the building of an additional structure.

DOE has addressed this comment by revising the alternatives and adding additional analyses for contingency storage in Section 4.14 of the Final EIS.

6.4.3 Summary of Public Hearings and Comments Received

Public comment hearings on the Draft EIS were held at the following locations during the public comment period:

- Rocky Flats Environmental Technology Site, Golden, Colorado, December 10, 1997
- Los Alamos Area Office, Los Alamos, New Mexico, December 11, 1997
- Savannah River Site area, Augusta, Georgia, December 16, 1997

The hearings were announced in the Federal Register Notice on the availability of the Draft EIS, as well as in local newspapers. The public comment hearings were informal in nature in order to allow for a free-flowing dialogue. The hearing attendees were offered an opportunity to provide formal remarks, which some opted to do. However, for the most part, attendees were able to ask questions, provide comments, and engage in open discussion. Attendees also had an opportunity to have one-on-one discussions with DOE representatives prior to and after the hearing sessions. A fact sheet and corresponding poster exhibits were made available at the hearings. The fact sheet is included in Appendix A of the Final EIS.

About 50 people attended the three public hearings. Attendees included local citizens, site employees, State and local officials, and representatives of various environmental or citizens organizations. About 40 comments and questions were received at the hearings. Key comments focused on the following concerns:

- More clarification on safeguards termination limits and variances to those limits, including conditions under which a variance would be granted, processing technologies that would be used for materials that have received or not received a variance, percentages of plutonium covered by existing variances, and status of variances.
- Questions or comments about specific processing technologies, such as salt distillation, salt scrub, water leach, Purex, and cementation.
- Suggestions to further evaluate vitrification options and use mobile vitrification units.
- Clarification on the final forms of the processed residues and separated plutonium.
- Clarification of the disposition path for separated plutonium.
- Clarification on the forms of the residues to be processed.
- Comments and clarification on the "pipe and go" concept (which is encompassed under the repackaging option in Alternative 4), including analyses that have been performed to address criticality.
- Suggestions to consider contingency storage at Rocky Flats.
- Suggestions to minimize transportation.
- Suggestions to consider other locations for smaller scale processing.
- Suggestions and questions on particular impacts analyses, including waste generated, emissions, process safety in terms of accidents, and transportation.
- Clarifications of materials that would be shipped to WIPP.
- Concerns about the Resource Conservation and Recovery Act designations for some residue categories, WIPP not receiving a State of New Mexico permit for receiving mixed wastes, and Colorado's jurisdiction over proposed disposition of RCRA wastes.

In response to these oral comments, DOE has provided additional clarification in the applicable sections of Chapter 2 of the Final EIS, as well as in the individual DOE responses provided in Section 9.5.1 of the Final EIS. (See also above summary of written comments and DOE responses.)

6.4.4 DOE Responses to Public Concerns

Individual responses to each of the comments submitted to DOE, including all of those summarized above, are provided in Chapter 9 of the Final EIS.